

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:)	
)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	
)	
ALLTEL Communications, Inc.)	DA 01-1866
Petition for Waiver of Sections 20.18(e) and)	TRS No. 806258
(g) of the Commission's Rules)	
To: The Commission		

**CONTINGENT AMENDMENT TO ALLTEL COMMUNICATIONS, INC.
PETITION FOR WAIVER**

ALLTEL Communications, Inc. ("ALLTEL") hereby submits an amendment, contingent on Commission approval and consummation of ALLTEL's acquisition of certain CenturyTel, Inc. ("CenturyTel") wireless properties,¹ to its July 25, 2001 petition (as amended November 30, 2001 and April 18, 2002) seeking limited waiver of the Commission's Phase II enhanced 911 ("E-911") rules.² The purpose of this filing is to apprise the Commission of ALLTEL's plans for

¹ ALLTEL submits the instant filing as the proposed transferee of control of the CenturyTel wireless properties subject to the transaction. This contingent amendment relates only to ALLTEL's proposed Phase II implementation schedule for the CenturyTel licensee entities. See Public Notice, *ALLTEL Communications, Inc. and CenturyTel, Inc. Seek FCC Consent to Transfer Control of Licenses*, WT Docket No. 02-85, DA 02-932 (rel. Apr. 23, 2002) ("Public Notice"). ALLTEL's and CenturyTel's pending waiver petitions relating to their existing markets remain in full effect independent of this filing and should be processed accordingly. This filing is "contingent" because the Phase II deployment schedule proposed herein would apply only if the transaction is consummated, and because ALLTEL's pending waiver remains pending. If the transaction is not approved or consummated, CenturyTel's pending waiver request for a network-based solution applicable to its existing markets will remain in effect. See also Public Notice, *WTB Seeks Comment on Wireless E911 Phase II Waiver Request Filed by ALLTEL Communications, Inc.*, CC Docket No. 94-102, DA 01-1866 (rel. Aug. 6, 2001). The Commission has determined to not initiate enforcement action against small and mid-sized carriers during the period it evaluates their waiver requests. Public Notice, CC Docket No. 94-102, FCC 01-302 (rel. Oct. 12, 2001).

² See ALLTEL Communications, Inc. Petition for Waiver of Sections 20.18(e) and (g) of the Commission's Rules, filed July 25, 2001 ("ALLTEL Petition"); Supplement to ALLTEL (continued on next page)

deploying CDMA technology and a handset-based Phase II solution in CenturyTel markets in the event of regulatory approval and consummation of the proposed transaction.³

It is important to emphasize that CenturyTel, a TDMA-based carrier, has not received any requests for Phase II service. Upon consummation, ALLTEL, which uses CDMA technology, will begin to deploy an assisted-GPS ("AGPS") solution concurrently with buildout of its CDMA-based network overlay on CenturyTel's existing TDMA service areas. ALLTEL's planned overlay schedule will facilitate the deployment of Phase II service throughout much of CenturyTel's coverage areas, *irrespective* of PSAP requests and more expeditiously than the piecemeal market-specific deployment which would occur under a network-based solution. ALLTEL's intended plan for Phase II deployment in CenturyTel markets after consummation of the transaction is consistent with the Commission's guidance with respect to Phase II waivers.

I. BACKGROUND

On March 19, 2002, ALLTEL and CenturyTel entered into a Stock Purchase Agreement pursuant to which ALLTEL will purchase certain of the wireless properties owned by CenturyTel. ALLTEL will thus acquire control of certain Part 22 cellular and Part 24 broadband PCS licensees currently controlled by CenturyTel and subject to the Commission's E-911 rules.⁴ If the Commission approves the transaction and the parties consummate, ALLTEL will obtain more than 700,000 additional customers in markets in Arkansas, Louisiana, Michigan,

Communications, Inc. Petition for Waiver of Sections 20.18(e) and (g) of the Commission's Rules, filed Nov. 30, 2001; ALLTEL Communications, Inc. Petition for Waiver of Sections 20.18(e) and (g) of the Commission's Rules – Second Supplement, filed April 18, 2002.

³ The rules require notification to the Commission *after* the carrier decides to change its E-911 Phase II deployment plan – which, in this case, cannot occur until consummation of the transaction. 47 C.F.R. § 20.18(i). Nevertheless, this filing is submitted in advance to reassure the Commission that, if consummated, ALLTEL will take measures to ensure expeditious Phase II deployment in CenturyTel markets, and to seek the Commission's concurrence as to ALLTEL's Phase II deployment approach for the CenturyTel markets.

⁴ See 47 C.F.R. § 20.18(a).

Mississippi, Texas and Wisconsin.⁵ The agreement requires ALLTEL to file the instant amendment such that, upon consummation, the CenturyTel wireless subsidiaries and affected service areas subject to the agreement will be incorporated into ALLTEL's pending request for Phase II relief and, upon closing, will be deemed to have selected a handset-based solution.⁶

In November 2000, ALLTEL reported to the Commission its selection of a "handset-based" assisted-GPS ("AGPS") solution to meet its Phase II obligations. ALLTEL has remained committed to deploying this technology and has made considerable progress in this regard. Nevertheless, because vendors were unable to timely provide compliant Phase II-capable products, ALLTEL has requested a waiver of the deadlines in the Commission's rules to deploy Phase II capabilities in accordance with the following schedule, subject to vendor availability:

- *Handset Activations.* Begin selling and activating AGPS-capable handsets by June 30, 2002; meet the 25% sales/activation benchmark by September 30, 2002; meet the 50% benchmark by March 31, 2003; and meet the 100% benchmark by September 30, 2003. ALLTEL has not sought waiver of the 95%/December 31, 2005 deadline of the rules.
- *Switch Upgrades.* Deploy software upgrades for Lucent switches, by June 30, 2002; for Nortel switches, by June 30, 2002; and for Motorola switches, by December 31, 2002.
- *PDE/MPC Deployment.* Deploy the remaining AGPS network components (e.g., position determining equipment ("PDE") and mobile positioning center ("MPC")) for *all* markets by September 30, 2002.
- *Initiation of Deployment to PSAPs.* ALLTEL's network will be Phase II-capable by September 30, 2002 for Lucent/Nortel markets, and by December 31, 2002 for Motorola markets. ALLTEL will immediately thereafter begin the steps needed to provide Phase II service in response to valid pending PSAP requests.

⁵ Licensee entities and markets subject to the instant filing are listed in Attachment 1, which does not include every licensee listed on the Public Notice. Rather, it lists those licensees over which ALLTEL will exercise management control and determine Phase II deployment. If the licensee is a partnership with partners other than an ALLTEL-controlled subsidiary, ALLTEL may need to obtain consent of the partnership as a whole to implement Phase II as proposed herein. ALLTEL will seek necessary consents as expeditiously as possible.

⁶ The rules require licensees to update "their plans for implementing Phase II [E-911] service, including the location-determination technology they plan to employ . . . within thirty days of the adoption of any change." 47 C.F.R. § 20.18(i). Upon consummation, CenturyTel's current Phase II plan will formally change and ALLTEL will notify the Commission accordingly.

- *Provisioning Service to PSAPs.* For Lucent and Nortel markets, ALLTEL will begin providing service to Phase II-capable PSAPs by March 31, 2003 or within 6 months of a valid request, whichever is later, and for Motorola markets by September 30, 2003 or within 6 months, whichever is later.

CenturyTel has selected a network-based solution for its TDMA wireless system.⁷

CenturyTel has not received any PSAP requests for Phase II service; thus, its Phase II deployment obligations have not yet begun.⁸ Nevertheless, CenturyTel has requested a limited waiver of the Commission's Phase II rules out of an abundance of caution. CenturyTel had initially hoped to begin deployment of Phase II capabilities in its network irrespective of PSAP requests. CenturyTel has since apprised the Commission of issues that have arisen in its Phase II deployment, including delays in the delivery of products from its sole switch vendor, Nortel, and its now limited ability to deploy certain Phase II capabilities in its network expeditiously.⁹

II. ALLTEL WILL DEPLOY AN AGPS SOLUTION IN CENTURYTEL'S TDMA MARKETS

ALLTEL intends to overlay CenturyTel's TDMA network with CDMA technology beginning as soon as possible after consummation of the transaction.¹⁰ In this regard, the public safety imperatives of Phase II service and ALLTEL's business objectives directly coincide.

⁷ See CenturyTel, Inc., Report on Implementation of Wireless E911 Phase II Automatic Location Information, filed Nov. 9, 2000 in CC Docket No. 94-102, at 2.

⁸ See 47 C.F.R. § 20.18(f); Public Notice, *Wireless Telecommunications Bur. Provides Guidance on Filings by Small and Mid-Sized Carriers Seeking Relief from Wireless E911 Phase II Automatic Location Identification Rules*, DA 01-2459, CC Docket No. 94-102, at 1 n.7 (rel. Oct. 19, 2001); Quarterly Report for CenturyTel Wireless, Inc., filed April 10, 2002, at 1-2 ("CenturyTel April Report"). CenturyTel reports that it has deployed E-911 Phase I service in 2 counties in Michigan and throughout its Texas markets, and is implementing such service in Louisiana, Mississippi, and in additional counties in Michigan. See Supplement to Petition of CenturyTel Wireless, Inc. for Limited Waiver, filed November 30, 2001, at 5.

⁹ See CenturyTel Supplement at 3-4; *Ex Parte* Presentation in CC Docket No. 94-102, dated November 8, 2001, Attachment; CenturyTel April Report at 2-4. CenturyTel and other carriers have apprised the Commission that there are currently no handset-based solutions widely available for TDMA-based carriers and that network-based solutions are significantly less accurate in rural areas than handset-based solutions.

¹⁰ ALLTEL is currently conducting traffic studies of TDMA usage on CenturyTel systems and is refining the buildout schedule for the CDMA overlay.

ALLTEL expects that, within 6 months of consummation, it will have sufficiently deployed a CDMA overlay throughout CenturyTel's more densely populated TDMA service areas to accommodate all new digital activations in MSAs. ALLTEL has established an ambitious objective of extending the CDMA overlay to 75 percent of the TDMA base stations in CenturyTel's MSAs within one year of closing, and to 100 percent of the MSA TDMA base stations and 75 percent of the RSA TDMA base stations after two years.¹¹ ALLTEL also is considering converting the remaining analog cell sites in the MSA markets to CDMA. The parties hope to consummate the transaction by late second quarter 2002 (in any event not later than the end of third quarter 2002), subject to necessary regulatory approvals. Thus, if the transaction is timely consummated (projected for July 1, 2002), the target dates for the CDMA overlay for CenturyTel's TDMA network would be as follows: not later than December 31, 2002 for the initial overlay with sufficient coverage in MSAs to accommodate all new digital activations; June 30, 2003, for the 75 percent overlay of TDMA base stations in MSAs; and June 30, 2004, for the 100 percent overlay of TDMA base stations in MSAs/75 percent in RSAs.

The AGPS Phase II solution will be deployed in the CenturyTel TDMA markets concurrently with the CDMA overlay. Based on information currently available from vendors, ALLTEL anticipates that CDMA switch technology to be deployed in CenturyTel markets will incorporate an AGPS network component as a standard feature. ALLTEL also will have selected a vendor for the network components of the AGPS solution (PDE and MPC) before the closing date. ALLTEL also intends – subject to product availability – that all new digital handset sales and activations 6 months after closing (approximately December 31, 2002) and thereafter will be of CDMA handsets. ALLTEL will thus adhere to its proposed March 31, 2003

¹¹ Based on ALLTEL's initial survey of CenturyTel's properties, 71 percent of CenturyTel's cell sites are TDMA (85 percent in MSA markets, 53 percent in RSA markets).

(50 percent) and September 30, 2003 (100 percent) deployment benchmarks for Phase II-capable handset activations, incorporating CenturyTel into ALLTEL's handset deployment schedule.

A number of steps will be necessary for ALLTEL to deploy AGPS in CenturyTel's TDMA markets. As a threshold matter, simple corporate governance and control principles preclude ALLTEL from taking *any* of these measures until after consummation of the transaction. Thus, necessary network upgrades and AGPS-capable handset sales could not begin until *after* Commission approval and consummation of the transaction. Moreover, the CDMA overlay itself will be an enormous undertaking. CenturyTel's network consists of hundreds of cell sites and 7 MSCs. Thus, even to the extent that AGPS-capable network components can be deployed during the initial CDMA overlay, it will take additional time, beyond the current proposed deployment schedule for ALLTEL's existing markets, to overlay CDMA base station facilities throughout CenturyTel's TDMA footprint and, hence, provide Phase II service.

ALLTEL has nevertheless sought to minimize departures from the proposed target dates for its existing markets and has established an ambitious deployment schedule for CenturyTel:

- ***Switch/Network Upgrades.*** ALLTEL anticipates that all CDMA switch upgrades, including Phase II functionality, deployment of the necessary network components of the AGPS solution (PDE and MPC) and a significant number of base station upgrades, will be complete within 6 months of consummation – currently contemplated to be *December 31, 2002*. At the end of the 6-month period, the CDMA overlay will be sufficient in scope to accommodate all new digital activations in MSAs. Thereafter, the coverage area for ALLTEL's AGPS solution will parallel the target dates of the CDMA overlay: throughout 75 percent of the TDMA base stations in CenturyTel's MSAs within one year of consummation (approximately *June 30, 2003*); and throughout 100 percent of the TDMA base stations in CenturyTel's MSAs and 75 percent of the TDMA base stations in the RSAs within 2 years of consummation (approximately *June 30, 2004*). ALLTEL is also considering converting all remaining analog cell sites in MSA markets to CDMA in the initial 2-year period. In remaining markets, ALLTEL will continue to evaluate where a conversion to CDMA technology is technologically and economically feasible, taking into account factors such as cell site availability, population density, and system traffic.
- ***Handset Sales.*** Based on current vendor representations, ALLTEL anticipates that it will be able to meet the target handset sale and activation benchmarks set forth in the ALLTEL Petition from March 31, 2003 onward. Thus, 50 percent of new handset activations will be AGPS-capable by *March 31, 2003*, and 100 percent of all new digital handset activations will be AGPS-capable by *September 30, 2003*. It is anticipated that at

a minimum, TDMA/analog subscribers will be migrated to new CDMA handsets in a timeframe consistent with industry rates for market churn. *ALLTEL does not seek a waiver of the December 31, 2005/95 percent market penetration requirement.*

- ***Service Provision to PSAPs.*** CenturyTel has received no PSAP requests for Phase II service. Nevertheless, ALLTEL will endeavor to provision Phase II service to PSAPs generally consistent with the schedule set forth in the ALLTEL Petition (as amended). If a valid PSAP request is received for an area in which ALLTEL's CDMA overlay is already complete, ALLTEL will provide service to Phase II-capable PSAPs within 6 months of a valid request. Where a PSAP requests service for a TDMA area not scheduled for the CDMA overlay until later in the two-year period, ALLTEL will work with the PSAP to overlay CDMA and initiate Phase II service throughout 50 and 100 percent of the TDMA coverage area in the PSAP's territory not later than 6 months and 18 months, respectively, after the request, and in any event not later than 6 months after completion of the CDMA overlay in such territory.¹² Where a PSAP requests service for a TDMA area not covered in the initial 2-year period, ALLTEL will work with the PSAP to overlay CDMA throughout 50 and 100 percent of the TDMA coverage area in the PSAP's territory not later than 6 months and 18 months, respectively, after the request.¹³ ALLTEL will also ensure that ALI-capable handsets are widely available in such PSAP coverage area.

III. DEPLOYMENT OF ALLTEL'S HANDSET-BASED TECHNOLOGY WILL EXPEDITE AVAILABILITY OF ACCURATE PHASE II SERVICE IN CENTURYTEL MARKETS

A. Commission Requirements for Phase II Waiver Requests Are Satisfied

The proposed deployment schedule is consistent with Commission standards for Phase II waiver requests.¹⁴ The instant proposal is focused on and limited to CenturyTel markets. Moreover, ALLTEL's actions to date demonstrate that it has already taken steps to come as close as possible to full compliance by working closely with vendors and by opting for a Phase II

¹² Given that there are no pending PSAP requests, ALLTEL anticipates its expeditious CDMA overlay schedule will enable it to substantially comply with most future PSAP requests in territories covered under the initial two-year CDMA overlay schedule within 6 months after the time the overlay in that market is complete.

¹³ These proposed deadlines for complying with valid PSAP requests will ensure that Phase II service is provided in TDMA coverage areas in a time frame similar to or better than that afforded under the Commission's rules governing network-based solutions.

¹⁴ The Commission requires: (1) that carriers' requests for waiver be specific, focused, and limited in scope; (2) that a carrier have taken concrete steps to come as close as possible to full compliance; and (3) that the carrier provide a clear path to full Phase II compliance. *Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Fourth Memorandum Opinion and Order*, 15 FCC Rcd. 17442, 17457-58 (2000).

solution that will provide higher accuracy for subscribers – factors which also work to the benefit of CenturyTel subscribers upon consummation of the transaction.¹⁵ Finally, while ALLTEL continues to evaluate and refine its CDMA overlay schedule, for purposes of the instant filing ALLTEL has provided a clear path to substantial Phase II compliance for the CenturyTel markets – in terms of Phase II accuracy, expeditious deployment of AGPS-capable handsets, and widespread availability of Phase II service to Phase II-capable PSAPs.

There is no technology alternative available that will fully satisfy the rules. CenturyTel and other TDMA-based carriers continue to report difficulties with respect to the availability of Phase II-compliant Nortel products.¹⁶ Moreover, handset-based solutions for TDMA subscribers are still in development and not commercially available. Even if a PSAP submits a valid request, there is significant uncertainty as to whether CenturyTel would be able to begin deployment in a timely manner. In addition, CenturyTel serves many rural areas. As numerous carriers (including ALLTEL) have demonstrated – and as the Commission has acknowledged – network-based solutions face significant problems with respect to accuracy in such markets due to low density and/or linear (*e.g.* along highways) cell site configuration. ALLTEL will be able to provide more reliable Phase II service in many such markets.¹⁷ Thus, if the transaction is not consummated and notwithstanding CenturyTel's best efforts, there remain significant issues as to whether full or timely compliance with the Commission's accuracy requirements and deployment deadlines is feasible in the event of a valid PSAP request.

¹⁵ See *Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Request for Waiver by Verizon Wireless, Order*, FCC 01-299, ¶¶ 17, 22 (rel. Oct. 12, 2001) ("*Verizon Order*").

¹⁶ See, *e.g.*, CenturyTel April Report at 2-3; Advantage Cellular Systems, Inc., Petition for Waiver, CC Docket No. 94-102, filed Sept. 21, 2001, at 2-3.

¹⁷ See *Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Third Report and Order*, 14 FCC Rcd. 17388, ¶ 24 (1999); *Verizon Order* ¶¶ 17, 22.

ALLTEL's planned CDMA overlay and deployment of an AGPS solution will facilitate the expeditious deployment of a location technology that will work far more effectively and reliably in many of CenturyTel's markets. ALLTEL has already committed personnel and financial resources to evaluate, test and deploy Phase II in close coordination with its vendors, and will be well under way to deploying Phase II service in its own markets when the transaction is consummated (assuming timely regulatory approval) late this year. ALLTEL will thus be well-positioned to "hit the ground running" with respect to Phase II deployment in the CenturyTel markets. ALLTEL has already made substantial progress with its switch and solution vendors, and its deployment plan would eliminate many of the uncertainties currently hanging over CenturyTel and other TDMA-based carriers.

The CenturyTel markets in which Phase I service is deployed (or in progress) are primarily in the company's higher-density markets, which will be the initial focus of ALLTEL's CDMA deployment; CDMA deployment will thus likely coincide with markets in which PSAPs are more likely to be Phase II-capable. Moreover, even if a PSAP validly requests Phase II service, a network-based solution will take time to deploy and, in any event, need not be deployed market-wide for 18 months thereafter. As noted above, for areas covered by two-year CDMA overlay schedule, ALLTEL anticipates it could comply with many PSAP requests well within that 18 month period – indeed, within 6 months in some cases.

Moreover, deployment of a network-based solution would necessarily be only on a spot, market-by-market basis. In contrast, ALLTEL will be deploying Phase II functionality in its CDMA network throughout the CenturyTel TDMA markets, and deploying Phase II-capable handsets in those markets, irrespective of any PSAP requests. Moreover, in the event that a valid PSAP request for service in the CenturyTel TDMA markets is received, ALLTEL will endeavor to ensure that handsets are available in the particular market at issue, and will work closely with the requesting PSAP to ensure that the requisite network capabilities are in place and tested to

ensure that Phase II service is available concurrently with the launch of CDMA service or shortly thereafter. Notwithstanding CenturyTel's good faith efforts, ALLTEL submits that its intended plan for Phase II deployment in CenturyTel's markets will more effectively serve the Commission's objectives in this proceeding.

CONCLUSION

For the foregoing reasons, ALLTEL's post-consummation plan for Phase II deployment in CenturyTel markets is consistent with the Commission's rules and guidance. ALLTEL seeks Commission consent to the instant petition contingent on consummation of the transaction.

Respectfully submitted,

ALLTEL COMMUNICATIONS, INC.

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May 10, 2002

ATTACHMENT

CENTURYTEL LICENSEES AND MARKETS SUBJECT TO TRANSACTION

LICENSEE	CALL SIGN	Market	BLOCK	Market Name
Century Cellunet of Southern Michigan Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKA300	CMA064	B	Grand Rapids, MI
Century Cellunet of Southern Michigan Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKA271	CMA078	B	Lansing-East Lansing, MI
Century Cellunet of Saginaw MSA Limited Partnership (d/b/a CenturyTel Wireless, Inc.)	KNKA417	CMA094	B	Saginaw-Bay City-Midland, MI
Century Cellunet of North Louisiana Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKA380	CMA100	B	Shreveport, Louisiana
Appleton-Oshkosh-Neenah MSA LP	KNKA425	CMA125	B	Appleton-Oshkosh-Neenah, WI
Century Cellunet of Southern Michigan Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKA503	CMA132	B	Kalamazoo, MI
Celutel of Biloxi, Inc.	KNKA782	CMA173	A	Biloxi-Gulfport, MS
Century Cellunet of Southern Michigan Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKA466	CMA177	B	Battle Creek, MI
Century Cellunet of Southern Michigan Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKA506	CMA181	B	Muskegon, MI
Century Cellunet of Southern Michigan Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKA539	CMA193	B	Benton Harbor, MI
CenturyTel Wireless of Alexandria, LLC	KNKA588	CMA205	B	Alexandria, LA
Century Cellunet of Southern Michigan Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKA639	CMA207	B	Jackson, MI
Century Cellunet of North Louisiana Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKA553	CMA219	B	Monroe, LA
Eau Claire Cellular Telephone LP	KNKA673	CMA232	B	Eau Claire, WI
Century Cellunet of Southwest Arkansas Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKA567	CMA240	B	Texarkana, TX - Texarkana, AR
Pascagoula Cellular Partnership (d/b/a CenturyTel Wireless, Inc.)	KNKA802	CMA252	A	Pascagoula, MS
Century Cellunet of LaCrosse LP	KNKA734	CMA290	B	La Crosse, WI
Century Cellunet of Pine Bluff, LLC (d/b/a CenturyTel Wireless, Inc.)	KNKA681	CMA291	B	Pine Bluff, AR
Jackson Cellular Telephone Company, Inc.	KNKA799		A	Jackson, MS
Century Cellunet of North Arkansas Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKN692	CMA325	B	Arkansas 2 - Marion
Century Cellunet of North Arkansas Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKN597	CMA326	B	Arkansas 3 - Sharp
Century Cellunet of Southwest Arkansas Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKN419	CMA334	B	Arkansas 11 - Hempstead
Century Cellunet of Arkansas RSA #12 Cellular L.P. CenturyTel Wireless, Inc.	KNKN968	CMA335	B	Arkansas 12 - Ouachita
Century Cellunet of North Louisiana Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKN647	CMA454	B	Louisiana 1 - Claiborne

LICENSEE	CALL SIGN	Market	BLOCK	Market Name
Century Cellunet of North Louisiana Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKN819	CMA455	B	Louisiana 2 - Morehouse
Century Cellunet of North Louisiana Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKN921	CMA456	B	Louisiana 3 - De Soto
CenturyTel Wireless of North Louisiana, LLC	KNKN688	CMA457	B	Louisiana 4 - Caldwell
CenturyTel Wireless of Michigan RSA #1 & #2, Inc.	KNKN898	CMA472	B	Michigan 1 - Gogebic
CenturyTel Wireless of Michigan RSA #1 & #2, Inc.	KNKQ320	CMA473	B	Michigan 2 - Alger
Cellular North Michigan Network General Partnership	KNKN698	CMA474	B	Michigan 3 - Emmet
Century Cellunet of Michigan RSA #4, Inc.	KNKN771	CMA475	B	Michigan 4 - Cheboygan
Cellular North Michigan Network General Partnership	KNKN910	CMA476	B	Michigan 5 - Manistee
Century Cellunet of Michigan RSA #6 Cellular Limited Partnership (d/b/a CenturyTel Wireless, Inc.)	KNKQ302	CMA477	B	Michigan 6 - Roscommon
Cellular Mobile Systems of Michigan RSA No. 7 LP (d/b/a CenturyTel Wireless, Inc.)	KNKQ319	CMA478	B	Michigan 7 - Newaygo
Century Cellunet of Southern Michigan Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKN915	CMA479	B	Michigan 8 - Allegan
Michigan RSA #9 Limited Partnership (d/b/a CenturyTel Wireless, Inc.)	KNKQ303	CMA480	B	Michigan 9 - Cass
Century Cellunet of Mississippi RSA #2, Inc. (d/b/a CenturyTel Wireless, Inc.)	KNKN623	CMA494	A	Mississippi 2 - Benton
CenturyTel Wireless of Mississippi RSA #5, LLC	KNKQ448	CMA497	A	Mississippi 5 - Washington
Century Cellunet of Mississippi RSA #6, Inc. (d/b/a CenturyTel Wireless, Inc.)	KNKN559	CMA498	A	Mississippi 6 - Montgomery
Century Cellunet of Mississippi RSA #7, Inc. (d/b/a CenturyTel Wireless, Inc.)	KNKN619	CMA499	A	Mississippi 7 - Leake
Century Cellunet of Southwest Arkansas Cellular LP (d/b/a CenturyTel Wireless, Inc.)	KNKN735	CMA658	B	Texas 7 - Fannin
Wisconsin RSA # 1 Limited Partnership	KNKN507	CMA708	B	Wisconsin 1 - Burnett
Wisconsin RSA # 2 L.P. (d/b/a CenturyTel Wireless, Inc.)	KNKN485	CMA709	B	Wisconsin 2 - Bayfield
Wisconsin RSA # 6 L.P. (d/b/a CenturyTel Wireless, Inc.)	KNKN541	CMA713	B	Wisconsin 6 - Trempealeau
Wisconsin RSA # 7 Limited Partnership	KNKN406	CMA714	B	Wisconsin 7 - Wood
Wisconsin RSA # 8 Limited Partnership (d/b/a CenturyTel Wireless, Inc.)	KNKN459	CMA715	B	Wisconsin 8 - Vernon
Appleton-Oshkosh-Neenah MSA LP	KNKN326	CMA716	B	Wisconsin 9 - Columbia